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October 1, 2001

Ex Parte Presentation

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Joint Application by SBC Communications Inc., et al. for Provision of In-Region,
InterLATA Services in Arkansas and Missouri, CC Docket No. 01-194*

Dear Ms. Salas:

On behalf of SBC Communications Inc. ("SBC") and at the request of FCC staff, I am attaching a response to a series of questions raised by the staff relating to the functioning of the loop maintenance operations system ("LMOS"). Some of the attachments are confidential.

In addition, at the request of FCC staff, I am enclosing copies of various affiliate transaction agreements between Southwestern Bell Telephone Company ("SWBT") and SBC Advanced Solutions, Inc. ("ASI"). These agreements are all available on the SBC website at <<http://www.sbc.com/PublicAffairs/PublicPolicy/Regulatory>>.

According to the Commission's rules governing confidential communications, I am enclosing one original copy of this letter with those pages of the attachments that are confidential. Inquiries regarding access to confidential material submitted with this letter should be addressed to Kevin Walker, Kellogg, Huber, Hansen, Todd & Evans, PLLC, 1615 M Street, N.W., Suite 400, Washington, D.C., 20036, (202) 367-7820.

Pursuant to the Commission's rules governing ex parte communications, I am enclosing two copies of this letter and attachments redacted for public inspection. Please file stamp and return the additional copy. Thank you for your kind assistance in this matter.

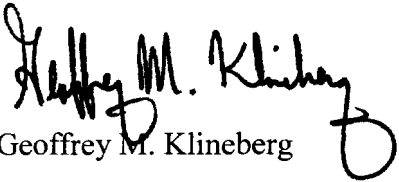
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Ex Parte Presentation

Sincerely,


Geoffrey M. Klineberg

Attachments

cc: Scott Bergmann
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Uzoma Onyeije
Layla Seirafi
Dana Joyce
Arthur H. Stuenkel
Qualex International (Redacted Version Only)

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Responses to Staff's Questions Regarding LMOS

Attached are answers to questions the FCC's staff has raised with respect to the posting of certain UNE-P service orders to SWBT's LMOS database system. As shown in the answers to those questions, errors in posting to the LMOS database have an extremely small possibility of preventing a CLEC from reporting an end-user trouble electronically.

It is important to recognize that SWBT provides CLECs with UNE-P lines with a very high degree of quality. For example, from June through August 2001, competitive LECs in SWBT's five-state region submitted trouble tickets on only about 0.75 percent of lines with service order activity during the first three days after installation. In other words, during the time when DOJ suggests that "new orders are particularly vulnerable to any problem," CLECs rarely have any troubles to report at all and do not open trouble tickets on 99.25 percent of those lines during this "particularly vulnerable" period. Even through the first five days after installation, the percentage of these UNE-P lines with trouble reports rises to only about 1.1 percent – still a remarkably small number.

Further, the vast majority of those few trouble tickets that CLECs open during the first five days after installation can be opened electronically – 85.57 percent of the tickets submitted on 1.1 percent CLEC UNE-P lines with service order activity. For example, in Missouri in July 2001, SWBT processed 3,929 UNE-P service orders. In light of CLECs' trouble report rates, discussed above, SWBT estimates that CLECs would have issued trouble tickets on only approximately 44 of the lines associated with these orders (i.e., 1.1%) within the first five days after provisioning. CLECs submitting these 44 trouble tickets would have had to open approximately 7 them manually – amounting to the submission of manual trouble tickets on less than two-tenths of one percent of the nearly 4,000 new UNE-P service orders for the month. See infra Ans. 5 & Attach. G.

Section 271 requires SWBT to provide CLECs with nondiscriminatory access to OSS functions, including its maintenance and repair systems. To the extent SWBT performs analogous maintenance and repair functions for its retail operations, it must provide CLECs access that enables them to perform maintenance and repair functions "in substantially the same time and manner" as SWBT provides to its retail customers. See New York Order ¶¶ 81-85; Kansas/Oklahoma Order ¶ 104; Pennsylvania Order App. C, ¶ 38. However, when analyzing "competitive checklist" compliance, the Commission has repeatedly held that it will not hold a BOC to a standard of perfection. See Michigan Order ¶¶ 203, 278; Louisiana II Order ¶ 57; New York Order ¶ 176; Texas Order ¶ 358.

It is surely the case that LMOS is not perfect. But, based upon the data provided in SBC's applications, in this written *ex parte* presentation, and that will be provided in SBC's Reply Comments, CLECs are clearly able to open trouble tickets electronically in LMOS "in substantially the same time and manner." Moreover, CLECs cannot argue, for there is no empirical data that would support such an argument, that the inability to open electronic trouble tickets on such a small number of UNE-P lines adversely affects their ability to compete, when the predominant CLEC providers of service utilizing UNE-P elect to open nearly half of all trouble tickets manually for their own business reasons, which have nothing to do with LMOS.

Question No. 1

What is SWBT's response to the data provided by AT&T (Willard/Van de Water Decl. at ¶¶ 19-24), indicating that UNE-P lines are not updated to SWBT's LMOS database in a timely manner?

Answer

1. As an initial matter, the overall results of LMOS/CABS database comparisons provided as Attachments B-E of the LMOS Affidavit have not been challenged. Taken together, these comparisons demonstrate that, over the June-July time frame, electronic trouble tickets could have been opened on a minimum of 99.5% of the UNE-P records contained in the LMOS database. Attachment A provides results for the comparisons that have occurred since SWBT's MO/AR 271 Application was filed, further confirming these overall results. This evidence demonstrates that, at any given time, CLECs were able to open electronic trouble tickets on 99.5% their UNE-P lines.
2. In addition, AT&T has not challenged the results of SWBT's analysis of the 53 telephone numbers provided by AT&T to SWBT on May 25, or the 10 numbers provided on July 9th. AT&T claimed that it was not properly listed as the service provider for these numbers. SWBT's investigation established that the LMOS update on 75% of the numbers cited by AT&T properly posted to LMOS on the day of conversion (i.e., Day 0), and that the remainder posted the following day.¹
3. As noted in the LMOS Affidavit, a conference call was held with AT&T on July 27, 2001 to discuss the results of the above investigation, as well as LMOS issues generally. Subsequently, on July 31, AT&T asked SWBT to investigate the LMOS status of an additional 10 telephone numbers (out of a sample of 292 tested by AT&T) on which AT&T had received the "not part of your customer profile message." The results of that investigation were discussed with AT&T in a conference call on August 15, 2001.²
4. It therefore was with some surprise that SWBT learned, upon receiving AT&T's Reply Comments that, at the same time SWBT and AT&T were discussing the telephone numbers referenced above, AT&T apparently was attempting to open "pseudo-trouble tickets"³ on

¹ See LMOS Aff. ¶¶ 38-39 & Attach. H.

² See LMOS Aff. ¶¶ 40-41 & Attach. H. In its comments, AT&T wrongly claims SWBT failed to provide "documentation or underlying detail to support its assertion that more than 70% of the of the orders updated to LMOS on the same nightly cycle as the "D" order." Willard/Van de Water Decl. ¶ 23, n.6. In fact, for each of the 140 telephone numbers reviewed by SWBT, Attachment G to the LMOS Affidavit provides Market Area; CLEC MCN; Telephone Number; D Service Order Number; D Service Order Completion Date; C Service Order Number; C Service Order Completion Date; C Service Order Post Date in SORD; LMOS Record Update Start Date; Date LMOS Record Update Start compared to Completion Date of Order and Type of Conversion. Similar detail is provided for all telephone numbers referenced in Attachment H as well. This level of detail stands in stark contrast to the summary charts provided as Attachments 1 and 2 to the Willard/Van de Water declaration (which provide no detail information on the orders or telephone numbers in question) and the complete lack of any underlying information on the sample of Texas orders tested by AT&T.

³ Upon entry of the 10-digit telephone number, the TBTA user either receives a message regarding the status of the line (such as "[t]his TN has been disconnected or ported out. No information available"), or it receives

Missouri UNE-P lines for two additional sample periods. Although AT&T chose not to discuss the results of those attempts prior to filing its comments in this proceeding, AT&T now contends that its results demonstrate that SWBT's LMOS update process is not timely.

5. First, on Saturday, July 28, AT&T states that it attempted to open trouble reports on all 100 Missouri UNE-P orders for which it received a service order completion (SOC) during the week of July 23 to 27. AT&T claims to have found that it received the "disconnected" message on every telephone number for which it received a SOC on July 25, 26, or 27.
6. Similarly, on Wednesday, August 29, AT&T states that it attempted to open trouble reports on all 310 UNE-P orders in Missouri for which AT&T received a SOC between August 20 and 28. AT&T claimed that it could not open trouble reports on any telephone number for which it received a SOC on August 27 or 28.
7. From these two instances, AT&T draws the conclusion that "the LMOS records for Missouri UNE-P customers are not updated until at least 3 business days after completion of the UNE-P conversion." AT&T is wrong.
8. The results of AT&T's tests were impacted by the fact that AT&T chose to run the test during the processing period for its CABS UNE-P bills. AT&T's CABS bill period for Missouri UNE-P orders is the 25th. This means that all service orders that complete before the 25th calendar day of the month should appear on the bill for that month. Data for the bill is pulled three to four business days after the bill date, in order to allow time for all service orders that completed before the 25th to post to CABS. Service orders that complete in this three-to-four day processing period (and therefore are supposed to appear on the following month's bill), are held in "interim status" and not allowed to post to CABS until after the bill processing period ends. At the end of the period, the orders post to CABS and are passed to the downstream systems, including LMOS.
9. The 25th bill processing period ended on July 30 and August 29, respectively. Given that AT&T conducted its Missouri TBTA testing on July 28 and August 29, it is not surprising that orders which completed on or after the 25th of either month had not posted as of the time the test was conducted. Notably, AT&T was able to open a pseudo-trouble ticket electronically on 100 percent of the telephone numbers for which it received a SOC on August 24, which is three business days before August 29 and, importantly, the day before the orders are held in interim status for billing purposes.⁴

the trouble entry screen, into which it enters a description of the trouble, contact information, etc. SWBT understands that AT&T simply entered telephone numbers into TBTA, and recorded those instances when it received a message, rather than the trouble entry screen. SWBT does not believe any actual trouble tickets were submitted by AT&T in this process. Notably, while AT&T seems to have submitted a vast number of "pseudo-trouble tickets" in an attempt to determine whether the LMOS record had been updated, it never once cites an instance where it was unable to open an electronic trouble ticket to report an actual end user trouble.

⁴ Thus, AT&T's claim that it could not open a trouble ticket until more than three business days after it received a SOC is belied by its own data.

10. By contrast, when AT&T attempted to open pseudo-trouble tickets on its Texas orders on August 31 – after the close of the bill period – it found very different results.⁵ Specifically, in Texas on August 31, AT&T was able to open electronic trouble tickets on 62% of the orders for which it received an SOC on August 30 (i.e., one day after completion), and AT&T found that more than 95% of the orders were fully updated within three days of completion.⁶
11. AT&T's Texas results comport with the results reported on SWBT's sample of 140 CLEC telephone numbers. SWBT's sample showed that for almost 55% of the 140 lines the LMOS record was updated on the day of completion and was available for trouble reporting purposes the next day (Day 1). More than 82% were available for trouble reporting purposes within three days of completion.⁷
12. As set out in Attachment B, similar results were obtained by SWBT in its review of a new, random sample of 285 CLEC orders from throughout its five-state region.⁸ Of these orders, 187 (66.31%) updated to LMOS on the day of installation, in the same nightly cycle as the D order. This means that the LMOS line record was complete for any trouble reports that may have been submitted on Day 1 – the first business day after completion. Of the 282 orders reviewed by SWBT, 97.16% were fully updated and available for trouble reporting purposes on Day 3 – again, closely matching AT&T's own findings in Texas.
13. Even more importantly, on two consecutive weeks in September, SWBT replicated AT&T's methodology for assessing updates to the LMOS database. Specifically, for the weeks of September 10-14 and 17-20, SWBT identified AT&T Missouri UNE-P service orders which had completed in SORD (and for which a SOC therefore had been returned to AT&T).⁹ On Saturday, September 15 and Friday, September 21, SWBT attempted to open pseudo-trouble tickets on each set of completed orders.
14. As set out in Attachment C, on Saturday, September 15, SWBT was able to open a pseudo-trouble report via TBTA on 100% of the AT&T UNE-P orders that received a SOC in the September 10-14 time frame; SWBT did not receive a single “disconnected” or “not part of

⁵ In Texas, in addition to the 25th bill period, AT&T has the 5th bill period for some of its UNE-P accounts.

⁶ Because AT&T failed to provide any detail on its Texas sample, SWBT was unable to determine what, if anything, might have occurred on the orders which AT&T claims were in error status as of September 7. Indeed, given AT&T's incorrect claim that SWBT did not provide supporting detail for its analysis of numbers AT&T previously provided to SWBT, AT&T's failure to offer any specific information about its Texas sample – and its decision to provide only summary tables regarding its Missouri samples – is surprising.

⁷ LMOS Aff. ¶ 37 & Attachment G.

⁸ For three of these orders, SWBT was unable to determine the date on which LMOS was updated.

⁹ For September 10-14, SWBT believes it identified all AT&T Missouri UNE-P conversion orders that completed in SORD for that week. Due to scheduled database maintenance activity, SWBT was unable to obtain completion information on AT&T's UNE-P orders for Friday, September 21. Accordingly, SWBT's second sample includes AT&T UNE-P completions for Monday through Thursday, September 17 – 20. As a result of the same database maintenance activity, SWBT was only able to test *** of the total *** AT&T UNE-P orders identified by SWBT as completed on Thursday, September 20.

your company profile” message. This means that electronic trouble reports could have been opened on 100% of AT&T’s completed orders, and that 100% of those orders – even those that completed on Friday – had appropriately updated to LMOS.

15. On Friday, September 21, SWBT was able to open pseudo-trouble reports on 100% of the orders that had completed over the prior four-day period. On three of those orders, SWBT received the “not part of your company profile” message. As discussed in the LMOS Affidavit, if AT&T had encountered such a message, it would have been given the option of proceeding to submit the report electronically, or of calling the report in manually.
16. Attachment D reflects similar results for Navigator’s Arkansas UNE-P orders over the same time frames. On Saturday, September 15, SWBT was able to open pseudo-trouble tickets on all but one of the UNE-P orders completed the prior week. SWBT investigated that one number and determined that it typed in the wrong telephone number into TBTA, accidentally attempting to open a pseudo-trouble ticket on a number that had been correctly in disconnected status in LMOS since January 2001. SWBT then investigated the number it intended to test and determined that it was correctly updated in LMOS on the day of installation.¹⁰
17. On Friday, September 21, SWBT was able to open trouble tickets on 100% of the orders that completed over the prior four-day period. On one order, which completed on September 8, SWBT received the “not part of your company provide message.” As noted above, if Navigator had encountered such a message in attempting to open an electronic trouble report, it would have been given the option of proceeding to submit the report electronically, or of calling the report in manually.
18. All of this evidence, including AT&T’s own sample of Texas orders, demonstrates that a significant percentage of orders update to LMOS within the first three days, with very few records left in disconnected status. Thus, AT&T’s concern that “SWBT’s failure to update LMOS records . . . will prevent CLECs from submitting trouble tickets electronically for at least the first three business days following completion of the order” is unfounded.

¹⁰ SWBT validated its test results to ensure that it correctly entered all of the 697 other telephone numbers tested into TBTA.

Question No. 2

Please explain your calculation of “Total CLEC UNE-P Line Activity” in the ex parte filed on Friday, September 21, as well as your calculation of the “Error Rate” also reflected in that ex parte. In your answer, please advise whether the same information will be available for the June 9 and July 19 LMOS/CABS database comparisons. If the information is not available, please explain why. Advise whether reported performance measurement data could be used for this purpose. Please also explain whether the lack of this data will impact the Texas Audit.

Response

1. In its comments, DOJ compared the number of records updated in the LMOS/CABS database comparisons on June 6, July 19 and August 2 with the growth in CABS UNE-P records since the previous comparison, and found what it termed an “error rate” of 13%, 24%, and 26% respectively. See DOJ Comments at 9 n.36; LMOS Aff. Attachs. C-E.
2. DOJ notes that because its calculation is based on the net growth in UNE-P lines between database comparisons, it overstates errors as a percentage of new orders. This is because net growth in UNE-P lines does not reflect the total CLEC UNE-P line activity that could have resulted in a disconnected LMOS line record during the same period. DOJ’s observation is accurate.
3. Each of the following activity types has the potential to result in a disconnected LMOS line record that would be updated in a subsequent LMOS/CABS database comparison:¹
 - UNE-P New Connects;²
 - Conversions of service from SWBT retail or CLEC resale to UNE-P;
 - CLEC-to-CLEC UNE-P conversions;

¹ The potential for a disconnected LMOS line record arises from the fact that these activity types involve both inward and outward action. For example, on retail to UNE-P conversions, when the D order posts to LMOS the end-user line record is put into disconnected status – this is outward activity. When the C order subsequently posts, it establishes the new carrier as the service provider, and places the record into working status. This is inward activity. Service orders on UNE-P lines with inward activity are designated with an “Inward Action Code.” An improperly disconnected LMOS record may result if the inward and outward activity is not processed correctly on these transactions.

² In the case of a UNE-P New Connect, there would be no outward activity associated with the order itself. However, the LMOS database maintains a disconnected line record for previously assigned telephone numbers. On a UNE-P new connect using a previously assigned telephone number, the disconnected LMOS line record is updated with the C-in order. Therefore, if the C-in order does not post, the CLEC could encounter an improperly disconnected LMOS line record if it attempted to open a trouble ticket electronically on that line. LMOS must build an entirely new line record for UNE-P new connects that use new, “previously unassigned” telephone numbers. Because line activity on a UNE-P new connect with a previously unassigned number cannot result in a disconnected record in the LMOS database, RBQ USOCs with Inward Action Codes on previously unassigned telephone numbers were excluded from the denominator of the calculation used to compare the number of UNE-P line records updated in the LMOS/CABS database comparison to the total UNE-P line activity during the period in question.

- CLEC UNE-P Billing Account Number (BAN) changes (i.e., the movement of UNE-P lines from one BAN to another);
 - CLEC UNE-P Outside Moves (i.e., movement of service to new address);
 - Changes to establish Hunting on existing UNE-P lines; and
 - Changes to Telephone Numbers on existing UNE-P lines.
4. The last five CLEC line activity types would not result in any growth in CLEC UNE-P lines, because they involve activity on already-existing UNE-P accounts. Further, as noted by DOJ, because growth in UNE-P lines is a function of both gain and loss of UNE-P end users, net growth alone will not reflect all UNE-P New Connects and conversions of service from SWBT retail or CLEC resale to UNE-P occurring in a given period.
 5. In order to determine total CLEC UNE-P line activity resulting from each of the above activity types, SWBT reviewed the LMOS service order file³ for every nightly update cycle that occurred between the August 2, August 21, September 10 and September 18 LMOS/CABS database comparisons. This same review also was conducted for the June 6 and July 19 database comparisons for the Houston and San Antonio Market Areas.⁴
 6. In each service order file, the UNE-P lines were identified through use of the Uniform Service Order Code (USOC) “RBQ.” The activity types identified in ¶ 3, above, were then identified by the presence of an Inward or “I” Action Code. All RBQ USOCs with an Inward Action Code since the last database comparison were then totaled. These totals are reflected in Attachment E, under the heading “Total CLEC UNE-P Line Activity.”
 7. DOJ uses the term “error” to refer to the number of LMOS line records updated in an LMOS/CABS database comparison. SBC also unfortunately used that term in its September 21 ex parte letter. In fact, LMOS records found to be disconnected in LMOS, but working in CABS at the time of a database comparison are updated, regardless of whether the disconnected status is truly an error or just simply part of the normal update process. In other words, the comparison and update process includes disconnected LMOS records that, but for

³ File Name: LMOS@.BE40211A.PACKETOT

⁴ The LMOS@.BE40211A.PACKETOT service order files for the June 6 and July 19 database comparisons were not available for the other SWBT Market Areas. A new generation – or version – of this file is created for every LMOS nightly update cycle (5 days a week). These files are typically retained for approximately 60 generations (5 update cycles a week, for 12 weeks). When the retention limit is reached, the oldest file is erased and the next generation is created. Older data was available for Houston and San Antonio due to a difference between the way the service order files were set up for these market areas, as compared to the files in the other market areas. Reported performance measurement results cannot substitute for this source of data. No performance measurement presents the total CLEC UNE-P line activity that could result in a disconnected LMOS UNE-P line record separate from any other type of CLEC UNE-P line activity. SWBT does not believe the scope of the Texas LMOS audit encompasses a historical review of the LMOS/CABS database comparisons. Data to be used in the Texas Audit for verification of performance measurements is stored in the ASKME database; data in ASKME is retained for a three-year period and is sufficient for purposes of the Texas Audit.

the comparison and update, would have updated automatically on a subsequent day as part of SWBT's normal system processes.

8. The numbers appearing under the heading "Percent Updated" on Attachment E were calculated by dividing the number of LMOS UNE-P line records updated in the specified database comparison (the "Number Updated" in Attachment E) by the "Total CLEC UNE-P Line Activity" occurring since the previous database comparison. As such, this percentage is a far more accurate representation of the relationship between the number of UNE-P Line records updated in SWBT's LMOS/CABS database comparisons and the total UNE-P line activity that could have resulted in the need for such an update at the time of the comparison than the DOJ's calculation.
9. The numbers appearing under the heading "Total Order Activity Factor" represent the ratio between the "Total CLEC UNE-P Line Activity" and the "Net Growth From Last Comparison." This factor reveals that, as DOJ anticipated, using "Net Growth From Last Comparison" is not an appropriate means of assessing the accuracy of order posting to LMOS, because there is no constant relationship – either across states or between comparison periods – between the net growth and the actual amount of CLEC UNE-P line activity that could have resulted in an incorrectly disconnected record in LMOS.
10. Further, even the Percent Updated numbers reflected on Attachment E do not represent an accurate calculation of the number of LMOS line records in "error" status. As explained above, because the comparison and update process involves a snapshot of the LMOS database, it will find instances in which a line is working in CABS but disconnected in LMOS for reasons unrelated to any error condition. Such lines would be updated to working status in LMOS through the normal, automated posting of the C order on a night subsequent to the comparison and update. Nonetheless, they will be recorded as having been updated through the comparison process.

Question No. 3

Please provide more information concerning the "CABS D" service order errors referenced at ¶ 22 of the LMOS Affidavit. Were these isolated incidents? How did you determine the errors had occurred? Did this impact the CLEC's ability to open electronic trouble tickets on UNE-P lines? If so, were they included in the "% Updated" calculations for LMOS Affidavit Attachments C through E? If not, why not?

Response

1. CLEC UNE-P accounts are established in SWBT's CABS billing system. For billing purposes, multiple CLEC UNE-P lines are grouped under a single Billing Account Number (BAN).¹
2. Disconnection of individual UNE-P lines in the CABS database is accomplished through use of a C service order, while disconnection of a CABS BAN is accomplished through use of a CABS D service order. Accordingly, a CABS D order that is issued incorrectly to disconnect an individual UNE-P line should hit CABS edits and fall out for manual correction before posting.
3. Between the June 6 and July 19 LMOS/CABS database comparisons, SWBT's LSC processed four separate CLEC requests for the disconnection of a four separate UNE-P telephone numbers. Rather than issuing C service orders for disconnection of the lines in question, three different LSC representatives erroneously issued CABS D orders.
4. As a result of a system change effective March 29, 2001,² LMOS processes D service orders after SORD completion, before they have passed through edits in the billing systems. Accordingly, when the CABS D orders in question posted to LMOS, all UNE-P line records associated with the CABS BANs in question were disconnected. Specifically:
 - Service orders *** both completed on June 22, 2001, resulting in the disconnection of the LMOS UNE-P records associated with Birch CABS BAN *** of these records were updated in the July 19 CABS/LMOS database comparison.
 - Service order *** completed June 25, 2001, resulting in the disconnection of the LMOS UNE-P line records associated with AT&T *** of these records were updated in the July 19, 2001 LMOS/CABS database comparison.
 - Service order *** completed July 17, 2001, resulting in the disconnection of the LMOS UNE-P line records for Choctaw Communications (Smoke Signals

¹ BANs for CLEC accounts are set up on a per LATA and per product basis, and can accommodate the billing of up to 99,999 individual UNE-P lines. Once this maximum number of UNE-P lines has been reached, another BAN must be established for billing of additional lines.

² See, LMOS Affidavit ¶ 16

Communications) ***

*** of these records were updated in the July 19, 2001 LMOS/CABS database comparison.

5. Although the LMOS records for these lines were disconnected, dialtone service to the end users was not adversely impacted. Only the UNE-P lines requested by the CLEC were actually disconnected by the orders in question.
6. On July 3, 2001, the LOC received calls from both AT&T and Birch advising that they were unable to open a trouble report electronically on certain telephone numbers. Upon investigation, SWBT discovered that issuance of the CABS D orders referenced above had lead to disconnection of the LMOS line records associated with the CABS BANS in question. Effective July 19, 2001, the logic for the LMOS nightly update cycle was revised to prevent LMOS from processing CABS D orders on UNE-P lines immediately after completion. Because CABS D orders now are updated in LMOS from the BJ501 file, after passing edits and posting to CABS, such disconnections should not occur in the future.
7. Effective July 19, 2001, SWBT's LSC service representatives were retrained concerning proper issuance of CABS D orders. While SWBT cannot guarantee that similar service order errors will not occur in the future, in the event such errors do occur, the programming change referenced in the previous paragraph will act to prevent improper disconnection of LMOS records.
8. Based on SWBT's investigation, it appears that no erroneous CABS D orders, other than those referenced above, were issued between March 29 and July 19, 2001. Prior to March 29, 2001, during the time in which D orders posted to LMOS after posting to the billing systems, an erroneously issued CABS D order should have been caught by CABS edits and manually corrected, as described above, thus preventing the posting of these orders to LMOS.
9. SWBT covered these issues with Birch and AT&T, on conference calls held on July 25 and August 15, respectively.
10. Because disconnection of the LMOS records in question was the result of manual error in service order creation, and protection against such errors in the future was quickly implemented, SWBT did not include those numbers in the "Total LMOS Records Placed in Working Status/Updated" category for the July 19 LMOS/CABS database comparison. In SWBT's LMOS Affidavit, the total number of LMOS records disconnected as a result of the CABS D orders in question appears at footnote 12. A footnote to LMOS Affidavit Attachment D stating "The San Antonio figures are adjusted to exclude 25,814 LMOS line records that were updated in this process, but were disconnected as a result of erroneous CABS D orders issued on three CABS BANS" was inadvertently omitted from the original filing. The correct version of Attachment D was provided with SBC's ex parte letter dated September 25, 2001.

Question No. 4

If a CLEC calls in a manual trouble report on a UNE-P line because it could not open the report electronically, is the LMOS record updated at that time? Are LMOS line records corrected at any time other than in the LMOS/CABS database comparisons?

Response

1. Service orders that error in attempting to post to LMOS fall out for manual handling by the LDRC. In order to assist the LDRC in prioritizing its correction efforts, the LDRC and the LOC have developed a collaborative process for ensuring that incorrect LMOS records upon which trouble reports have been submitted are corrected on a timely basis. This process occurs simultaneously with SWBT's attempts to resolve the trouble submitted. Contrary to claims by AT&T,¹ SWBT does not wait for the LMOS record to be updated before working the trouble ticket.
2. When a trouble report is manually submitted to the LOC and the LOC customer service representative (CSR) determines that the LMOS record is not completely accurate, the CSR fills out an LMOS Database Resolution Center (LDRC) form which is sent to the LDRC for LMOS line record correction. These forms are designated "high priority" when the CSR determines that the LMOS line record: 1) does not indicate the correct CLEC; 2) does not provide any data; or 3) indicates the account is disconnected or unassigned. The LDRC has committed to correct High Priority LDRC forms within 24 hours if the CLEC service orders have completed/posted in the appropriate systems.² See Attachment F.
3. As discussed in the LMOS Affidavit ¶ 52, when the LOC takes a manual trouble report on an LMOS record in disconnected status, the LOC service representative enters a narrative onto the trouble ticket containing the CLEC's four digit Alternate Exchange Carrier Number (AECN) and the account class of service. SWBT's systems are programmed to capture the CLEC AECN and class of service from the narrative entered by the LOC, thereby allowing trouble reports to be included in the correct CLEC performance measurements regardless of whether the LMOS record has been updated.

¹ Willard/Van de Water Decl. ¶ 28

² SWBT's LSC is responsible for correcting CLEC service orders that error in attempting to complete in SORD or post to CABS.

Question No. 5

What, if anything, has SWBT done to verify that “C” orders, after posting in CABS, are sent for posting to LMOS? See LMOS Aff. ¶ 32 & Attach. F-2.

Response

1. To estimate the potential effect of any possible delay in the posting of “D” and “C” orders to LMOS, SWBT used data from its performance measurements on the posting of “C” orders to CABS. See LMOS Aff. Attach. F. As explained in the LMOS Affidavit:

[O]n a nightly basis (during the business week), CRIS program BJ501 produces a file containing information on all service orders posted to CRIS and CABS for that business day (referred to as the “BJ501 file”). The BJ501 file is made available that night to other systems, including LMOS and SORD, for posting. SORD will reflect the next business day as the posted date.

Id. n.7 (emphasis added).

2. Because SORD reflects the first business day after posting as the posted date, the “C Service Order Post Date in SORD” in Attachment G to the LMOS Affidavit is one business day after the “LMOS Record Update Start Date” for each of the 140 CLEC UNE-P conversion orders reviewed. (The same is true of the sample of August CLEC UNE-P conversion orders presented in Attachment B to this letter.)
3. This fact also explains why SWBT’s performance measurement data for CABS posting (PM 17.1) does not show any “C” orders posting to CABS on the day of installation (i.e., Day 0), even though a high percentage of “C” orders actually post to LMOS (after posting to CABS) on the day of installation. See LMOS Aff. Attachs. F-1 & G; see also Attachs. B and G to this letter.
4. Nonetheless, because posting data was most readily available – and because it presented a conservative approach to estimating LMOS posting timeliness – SWBT used the CABS posting data for its “lag” analysis. In doing so, SWBT also made a number of other conservative assumptions:
 - First, SWBT assumed that no “C” orders posted to LMOS on Day 0 because the CABS posting data shows no orders posting on that day, even though direct examination of LMOS showed a high percentage of such orders posting correctly to LMOS on Day 0. See LMOS Aff. Attach. F-3.
 - Second, SWBT also assumed that a “C” order posted successfully to LMOS on the same day that it showed as posting in CABS in the performance data. See id. Attach. F-2.
5. Upon further investigation, SWBT can now confirm that orders completed in CABS on a given night may not always be included as part of that night’s BJ501 file that is sent to LMOS and other downstream systems. If, in a given market area within the SWBT region, the CABS order processing run is longer than the CRIS order processing run that night, there

is a chance that the market region's CABS output file (CF114) will be included in the following night's BJ501 file. The fact that a CF114 file in one area is included in the following night's BJ501 file, however, does not impact the CF114 files in the other six SWBT market areas. SWBT is unable to quantify precisely the frequency with which the CF114 file in any given market region will be included in the following night's BJ501 file, but conservatively estimates that it occurs less than 30 percent of the time.

6. For a number of reasons, this alteration to the assumption used in SWBT's analysis does not materially alter the results of that analysis:
 - First, the use of CABS posting data to approximate LMOS posting data already likely overstates the true LMOS posting date. As noted above, if a "C" order posts correctly to LMOS the same night that it posted to CABS, the posting date for performance measurement purposes will be recorded as one business day after the actual CABS and LMOS posting date. In fact, in Attachment F of the LMOS affidavit, the assumption was that no orders submitted on day 1 could be opened electronically.
 - Second, LMOS Affidavit Attachment F includes an analysis using only June CABS posting data. Although June posting data showed a much lower percentage of orders posting on Day 0 than in prior months, but a comparable percentage of orders posting by Day 3, the estimated percentage of trouble tickets potentially impacted increased by only 0.47 percent.
7. Finally, SWBT has re-run its analysis using actual LMOS posting data, based on the set of 140 UNE-P conversion orders from July 2001, detailed in Attachment G to the LMOS Affidavit, and another set of 282 UNE-P conversion orders from August 2001, detailed in Attachment B to this letter. This analysis reveals that:
 - CLECs can expect to have 1.1 percent of all the trouble tickets they submit affected by a delay in posting – put another way, the lag should not affect 98.9 percent of those trouble tickets. See Attachment G.
 - At least 99.84 percent of UNE-P customers are unaffected by any posting delay See id.
 - CLECs can expect to be able to submit electronically 85.57 percent of the tickets submitted on Days 0 through 5. See id.
8. In other words, basing SWBT's analysis directly on LMOS posting data – rather than indirectly on the CABS posting data in the performance measurements – not only provides a truer picture of the extremely minimal impact of any posting delay on the ability of CLECs to open electronic trouble tickets, but also shows that the SWBT's earlier analysis overestimated the impact of this delay.
9. This analysis demonstrates that the "lag" could have prevented submission of trouble tickets on an incredibly small number of CLEC trouble tickets. For example, in Missouri in July, SWBT processed 3,929 service new orders for UNE-P service that could have generated a trouble report within the first 5 days. In that month, only 1.11 percent of all UNE-P orders

with service order activity had a trouble ticket submitted within the first five days. This means that there were approximately only 44 trouble tickets issued on these service orders within the first five days after provisioning and, therefore, that could have been affected by posting delay.

10. Using the analysis described in paragraph 7, above, however, reveals that 37 or 38 of those 44 trouble tickets would not have been affected by any posting delay and could have been opened electronically. The remaining 6 or 7 trouble tickets, on which a CLEC would have encountered a disconnected LMOS line record at the time it attempted to open a trouble ticket electronically, accounts for only 0.18 percent (i.e., less than 2/10 of one percent) of the new UNE-P service order activity for the month.
11. As of July, there were approximately 60,904 CLEC UNE-P lines in Missouri. It is hard to see how the possibility that CLECs might not have been able to open an electronic trouble ticket on 7 lines during that month – 0.01 percent of the total number of working CLEC lines – can legitimately be regarded as impacting CLECs' ability to complete. Notably, no commenter in this proceeding points to a specific instance in which it was unable to report an actual end user trouble electronically.

Attachment A

LMOS/CABS Comparison and Update
Effective August 21, 2001

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL LMOS RECORDS DISCONNECTED/ WORKING IN CABS	TOTAL LMOS RECORDS PLACED IN WORKING STATUS/UPDATED	% UPDATED
DALLAS	344847	414	414	0.12%
HOUSTON	388867	674	674	0.17%
SAN ANTONIO	483710	515	515	0.11%
TEXAS TOTAL	1217424	1603	1603	0.13%
MISSOURI	61203	70	70	0.11%
KANSAS	54934	47	47	0.09%
ARKANSAS	7753	21	21	0.27%
OKLAHOMA	26599	28	28	0.11%
MOKA TOTAL	150489	166	166	0.11%
SWBT TOTAL	1,367,913	1,769	1,769	0.13%

LMOS/CABS Comparison and Update

Effective September 10, 2001*

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL LMOS RECORDS DISCONNECTED/ WORKING	TOTAL LMOS RECORDS PLACED IN WORKING STATUS/UPDATED	% UPDATED
DALLAS	348567	530	530	0.15%
HOUSTON	395511	3363 †	3363	0.85%
SAN ANTONIO	486050 ‡	2043 ‡	2043	0.42%
TEXAS TOTAL	1230128	5936	5936	0.48%
MISSOURI	61874	28	28	0.05%
KANSAS	55606	40	40	0.07%
ARKANSAS	8092	11	11	0.14%
OKLAHOMA	27232	9	9	0.03%
MOKA TOTAL	152804	88	88	0.06%
SWBT TOTAL	1,382,932	6,024	6,024	0.44%

* Originally scheduled for September 5, 2001. The September 5 CABS extract files for Houston and San Antonio, however, were made available too late for processing during the scheduled September 5 comparison and update; the September 5 CABS extract file for Missouri did not contain current data. SWBT then conducted a second comparison and update for all seven market areas on September 10, 2001. For Dallas, Oklahoma, Kansas, and Arkansas, the number of records updated reflects records updated on both dates.

† The CABS file provided for Houston for use in the September 10, 2001 comparison and update process was dated September 7, 2001 (the business day preceeding the comparison). However, on the night of September 7, 2001, the CF114 file for Houston was not included in that night's BJ501 file for posting to LMOS and other downstream systems. See Ex Parte Letter, Ans. 5, ¶ 5. As a result, the comparison on September 10 identified a number of line records as working in CABS but disconnected in LMOS, for which the C order was included in the BJ501 file on the night of September 10. SWBT is unable to quantify the number of line records affected.

‡ On September 19, 2001, SWBT discovered that, due to a change in the name of the file containing the CABS extract for San Antonio, the comparison for San Antonio was inadvertently conducted using CABS data from September 5, 2001. As a result, a number of line records that were correctly placed in disconnected status after September 5 – but which were working as of September 5 – were updated and placed in working status on September 10. (The total CABS UNE-P records figure for San Antonio is also based on September 5 data.) SWBT is unable at this time to quantify the number of line records affected, but is in the process of returning those line records to disconnected status. Because telephone numbers for disconnected lines are not reused for a number of months after the disconnection, that these line records are incorrectly in working status should cause no problems in the updating of LMOS in the future, as SWBT plans to correct these line records before the numbers are re-used.

LMOS/CABS Comparison and Update
Effective September 18, 2001*

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL LMOS RECORDS DISCONNECTED/ WORKING IN CABS	TOTAL LMOS RECORDS PLACED IN WORKING STATUS/UPDATED	% UPDATED
DALLAS	350860	2805 †	2805	0.80%
HOUSTON	397906	113	113	0.03%
SAN ANTONIO*	490802	458	458	0.09%
TEXAS TOTAL	1239568	3376	3376	0.27%
MISSOURI	62266	56	56	0.09%
KANSAS	56042	15	15	0.03%
ARKANSAS	8417	2	2	0.02%
OKLAHOMA	27606	4	4	0.01%
MOKA TOTAL	154331	77	77	0.05%
SWBT TOTAL	1,393,899	3,453	3,453	0.25%

* On September 19, 2001, SWBT discovered that, due to a change in the name of the file containing the CABS extract for San Antonio, the comparison for San Antonio on September 18 was inadvertently conducted using CABS data from September 5, 2001. As a result, a number of line records that were correctly placed in disconnected status after September 5 – but which were working as of September 5 – were updated and placed in working status on September 18. Upon identifying this issue, on September 20, SWBT returned to disconnected status those LMOS line records that were correctly in disconnected status on September 18; however, SWBT left in working status those lines that had been returned to working status by service order activity between September 5 and September 20. SWBT then conducted a comparison and update for San Antonio on September 24, 2001.

† The number of line records updated in Dallas on September 18 was impacted by an error subsequently discovered in the BE294 program used by LMOS. See LMOS Aff. at 18 n.25. SWBT is currently working to isolate the source of this error and to correct the BE294 programming accordingly.

Attachment B

Sample of 285 CLEC UNE-P Conversions

	Market Area Name	MCN	Telephone Number / CCKT	D Service Order Number	D Order Completion Date	C Service Order Number	C Service Order Completion Date	C Service Order Post Date in SORD	LMOS Record Update Start Date	Date LMOS Record Update Start compared to Completion Date of Order	Type of Conversion (resale, retail, UNE-P)
1	Arkansas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/02/2001	08/01/2001	Day 0	resale
2	Arkansas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/02/2001	08/01/2001	Day 0	retail
3	Arkansas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/02/2001	08/01/2001	Day 0	resale
4	Arkansas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/02/2001	08/01/2001	Day 0	resale
5	Arkansas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/02/2001	08/01/2001	Day 0	resale
6	Arkansas	*** **	*** **	*** **	08/02/2001	*** **	08/02/2001	08/03/2001	08/02/2001	Day 0	resale
7	Arkansas	*** **	*** **	*** **	08/02/2001	*** **	08/02/2001	08/03/2001	08/02/2001	Day 0	resale
8	Arkansas	*** **	*** **	*** **	08/02/2001	*** **	08/02/2001	08/03/2001	08/02/2001	Day 0	resale
9	Arkansas	*** **	*** **	*** **	08/03/2001	*** **	08/03/2001	08/06/2001	08/03/2001	Day 0	resale
10	Arkansas	*** **	*** **	*** **	08/03/2001	*** **	08/03/2001	08/06/2001	08/03/2001	Day 0	resale
11	Arkansas	*** **	*** **	*** **	08/10/2001	*** **	08/10/2001	08/13/2001	08/10/2001	Day 0	resale
12	Arkansas	*** **	*** **	*** **	08/10/2001	*** **	08/10/2001	08/13/2001	08/10/2001	Day 0	resale
13	Arkansas	*** **	*** **	*** **	08/14/2001	*** **	08/14/2001	08/15/2001	08/14/2001	Day 0	retail
14	Arkansas	*** **	*** **	*** **	08/14/2001	*** **	08/14/2001	08/15/2001	08/14/2001	Day 0	resale
15	Arkansas	*** **	*** **	*** **	08/14/2001	*** **	08/14/2001	08/15/2001	08/14/2001	Day 0	resale
16	Arkansas	*** **	*** **	*** **	08/14/2001	*** **	08/14/2001	08/15/2001	08/14/2001	Day 0	resale
17	Arkansas	*** **	*** **	*** **	08/15/2001	*** **	08/15/2001	08/16/2001	08/15/2001	Day 0	resale
18	Arkansas	*** **	*** **	*** **	08/15/2001	*** **	08/15/2001	08/16/2001	08/15/2001	Day 0	resale
19	Arkansas	*** **	*** **	*** **	08/15/2001	*** **	08/15/2001	08/16/2001	08/15/2001	Day 0	resale
20	Arkansas	*** **	*** **	*** **	08/15/2001	*** **	08/15/2001	08/21/2001	08/20/2001	Day 3	retail
21	Central / West Texas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/02/2001	08/01/2001	Day 0	UNE-P
22	Central / West Texas	*** **	*** **	*** **	08/02/2001	*** **	08/02/2001	08/03/2001	08/02/2001	Day 0	UNE-P
23	Central / West Texas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/03/2001	08/02/2001	Day 1	UNE-P
24	Central / West Texas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/03/2001	08/02/2001	Day 1	retail
25	Central / West Texas	*** **	*** **	*** **	08/01/2001	*** **	08/01/2001	08/03/2001	08/02/2001	Day 1	retail
26	Central / West Texas	*** **	*** **	*** **	08/03/2001	*** **	08/03/2001	08/07/2001	08/06/2001	Day 1	UNE-P
27	Central / West Texas	*** **	*** **	*** **	08/03/2001	*** **	08/03/2001	08/07/2001	08/06/2001	Day 1	UNE-P
28	Central / West Texas	*** **	*** **	*** **	08/07/2001	*** **	08/07/2001	08/08/2001	08/07/2001	Day 0	retail
29	Central / West Texas	*** **	*** **	*** **	08/06/2001	*** **	08/06/2001	08/08/2001	08/07/2001	Day 1	retail
30	Central / West Texas	*** **	*** **	*** **	08/07/2001	*** **	08/07/2001	08/13/2001	08/10/2001	Day 3	UNE-P
31	Central / West Texas	*** **	*** **	*** **	08/08/2001	*** **	08/08/2001	08/13/2001	08/10/2001	Day 2	retail

Attachment B - 1

Redacted - For Public Inspection

Sample of 285 CLEC UNE-P Conversions

	Market Area Name	MCN	Telephone Number / CCKT	D Service Order Number	D Order Completion Date	C Service Order Number	C Service Order Completion Date	C Service Order Post Date in SORD	LMOS Record Update Start Date	Date LMOS Record Update Start compared to Completion Date of Order	Type of Conversion (resale, retail, UNE-P)
32	Central / West Texas	*** ***	*** ***	*** ***	08/09/2001	*** ***	08/09/2001	08/13/2001	08/10/2001	Day 1	retail
33	Central / West Texas	*** ***	*** ***	*** ***	08/06/2001	*** ***	08/06/2001	08/13/2001	08/10/2001	Day 4	UNE-P
34	Central / West Texas	*** ***	*** ***	*** ***	08/13/2001	*** ***	08/13/2001	08/14/2001	08/13/2001	Day 0	retail
35	Central / West Texas	*** ***	*** ***	*** ***	08/13/2001	*** ***	08/13/2001	08/14/2001	08/13/2001	Day 0	retail
36	Central / West Texas	*** ***	*** ***	*** ***	08/13/2001	*** ***	08/13/2001	08/14/2001	08/13/2001	Day 0	retail
37	Central / West Texas	*** ***	*** ***	*** ***	08/11/2001	*** ***	08/11/2001	08/14/2001	08/13/2001	Day 1	resale
38	Central / West Texas	*** ***	*** ***	*** ***	08/14/2001	*** ***	08/14/2001	08/15/2001	08/14/2001	Day 0	UNE-P
39	Central / West Texas	*** ***	*** ***	*** ***	08/14/2001	*** ***	08/14/2001	08/15/2001	08/14/2001	Day 0	UNE-P
40	Central / West Texas	*** ***	*** ***	*** ***	08/14/2001	*** ***	08/14/2001	08/15/2001	08/14/2001	Day 0	retail
41	Central / West Texas	*** ***	*** ***	*** ***	08/15/2001	*** ***	08/15/2001	08/16/2001	08/15/2001	Day 0	retail
42	Central / West Texas	*** ***	*** ***	*** ***	08/15/2001	*** ***	08/15/2001	08/16/2001	08/15/2001	Day 0	retail
43	Central / West Texas	*** ***	*** ***	*** ***	08/16/2001	*** ***	08/16/2001	08/17/2001	08/16/2001	Day 0	retail
44	Central / West Texas	*** ***	*** ***	*** ***	08/17/2001	*** ***	08/17/2001	08/20/2001	08/17/2001	Day 0	UNE-P
45	Central / West Texas	*** ***	*** ***	*** ***	08/20/2001	*** ***	08/20/2001	08/21/2001	08/20/2001	Day 0	retail
46	Central / West Texas	*** ***	*** ***	*** ***	08/22/2001	*** ***	08/22/2001	08/23/2001	08/22/2001	Day 0	resale
47	Central / West Texas	*** ***	*** ***	*** ***	08/22/2001	*** ***	08/22/2001	08/23/2001	08/22/2001	Day 0	retail
48	Central / West Texas	*** ***	*** ***	*** ***	08/27/2001	*** ***	08/27/2001	08/28/2001	08/27/2001	Day 0	UNE-P
49	Central / West Texas	*** ***	*** ***	*** ***	08/27/2001	*** ***	08/27/2001	08/28/2001	08/27/2001	Day 0	retail
50	Central / West Texas	*** ***	*** ***	*** ***	08/27/2001	*** ***	08/27/2001	08/28/2001	08/27/2001	Day 0	retail
51	Central / West Texas	*** ***	*** ***	*** ***	08/24/2001	*** ***	08/24/2001	08/28/2001	08/27/2001	Day 1	retail
52	Central / West Texas	*** ***	*** ***	*** ***	08/24/2001	*** ***	08/24/2001	08/28/2001	08/27/2001	Day 1	UNE-P
53	Central / West Texas	*** ***	*** ***	*** ***	08/27/2001	*** ***	08/27/2001	08/29/2001	08/28/2001	Day 1	retail
54	Central / West Texas	*** ***	*** ***	*** ***	08/24/2001	*** ***	08/24/2001	08/29/2001	08/28/2001	Day 2	UNE-P
55	Central / West Texas	*** ***	*** ***	*** ***	08/28/2001	*** ***	08/28/2001	08/29/2001	08/28/2001	Day 0	retail
56	Central / West Texas	*** ***	*** ***	*** ***	08/27/2001	*** ***	08/27/2001	08/31/2001	unavailable *	n/a	UNE-P
57	Central / West Texas	*** ***	*** ***	*** ***	08/30/2001	*** ***	08/30/2001	08/31/2001	08/30/2001	Day 0	retail
58	Central / West Texas	*** ***	*** ***	*** ***	08/30/2001	*** ***	08/30/2001	08/31/2001	08/30/2001	Day 0	retail
59	Central / West Texas	*** ***	*** ***	*** ***	08/29/2001	*** ***	08/29/2001	08/31/2001	08/30/2001	Day 1	retail
60	Central / West Texas	*** ***	*** ***	*** ***	08/29/2001	*** ***	08/29/2001	08/31/2001	08/30/2001	Day 1	retail
61	Central / West Texas	*** ***	*** ***	*** ***	08/29/2001	*** ***	08/29/2001	08/31/2001	08/30/2001	Day 1	retail
62	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/01/2001	*** ***	08/01/2001	08/02/2001	08/01/2001	Day 0	retail

Sample of 285 CLEC UNE-P Conversions

	Market Area Name	MCN	Telephone Number / CCKT	D Service Order Number	D Order Completion Date	C Service Order Number	C Service Order Completion Date	C Service Order Post Date in SORD	LMOS Record Update Start Date	Date LMOS Record Update Start compared to Completion Date of Order	Type of Conversion (resale, retail, UNE-P)
63	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/01/2001	*** ***	08/01/2001	08/02/2001	08/01/2001	Day 0	retail
64	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/02/2001	*** ***	08/02/2001	08/03/2001	08/02/2001	Day 0	retail
65	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/02/2001	*** ***	08/02/2001	08/03/2001	08/02/2001	Day 0	retail
66	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/08/2001	*** ***	08/08/2001	08/09/2001	08/08/2001	Day 0	resale
67	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/08/2001	*** ***	08/08/2001	08/13/2001	08/10/2001	Day 2	retail
68	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/06/2001	*** ***	08/06/2001	08/13/2001	08/10/2001	Day 4	retail
69	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/06/2001	*** ***	08/06/2001	08/13/2001	08/10/2001	Day 4	retail
70	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/08/2001	*** ***	08/08/2001	08/13/2001	08/10/2001	Day 2	retail
71	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/09/2001	*** ***	08/09/2001	08/13/2001	08/10/2001	Day 1	retail
72	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/09/2001	*** ***	08/09/2001	08/13/2001	08/10/2001	Day 1	retail
73	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/13/2001	*** ***	08/13/2001	08/14/2001	08/13/2001	Day 0	retail
74	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/13/2001	*** ***	08/13/2001	08/14/2001	08/13/2001	Day 0	retail
75	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/14/2001	*** ***	08/14/2001	08/15/2001	08/14/2001	Day 0	retail
76	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/14/2001	*** ***	08/14/2001	08/15/2001	08/14/2001	Day 0	retail
77	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/15/2001	*** ***	08/15/2001	08/16/2001	08/15/2001	Day 0	retail
78	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/15/2001	*** ***	08/15/2001	08/16/2001	08/15/2001	Day 0	resale
79	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/20/2001	*** ***	08/20/2001	08/21/2001	08/20/2001	Day 0	UNE-P
80	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/20/2001	*** ***	08/20/2001	08/21/2001	08/20/2001	Day 0	retail
81	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/16/2001	*** ***	08/16/2001	08/21/2001	08/20/2001	Day 2	retail
82	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/16/2001	*** ***	08/16/2001	08/21/2001	08/20/2001	Day 2	retail
83	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
84	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
85	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
86	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
87	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
88	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/22/2001	*** ***	08/22/2001	08/23/2001	08/22/2001	Day 0	retail
89	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/22/2001	*** ***	08/22/2001	08/23/2001	08/22/2001	Day 0	retail
90	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/24/2001	*** ***	08/24/2001	08/28/2001	08/27/2001	Day 1	retail
91	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/24/2001	*** ***	08/24/2001	08/28/2001	08/27/2001	Day 1	resale
92	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/24/2001	*** ***	08/24/2001	08/28/2001	08/27/2001	Day 1	retail
93	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/28/2001	*** ***	08/28/2001	08/30/2001	08/29/2001	Day 1	retail

Sample of 285 CLEC UNE-P Conversions

	Market Area Name	MCN	Telephone Number / CCKT	D Service Order Number	D Order Completion Date	C Service Order Number	C Service Order Completion Date	C Service Order Post Date in SORD	LMOS Record Update Start Date	Date LMOS Record Update Start compared to Completion Date of Order	Type of Conversion (resale, retail, UNE-P)
94	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/27/2001	*** ***	08/27/2001	08/30/2001	08/29/2001	Day 2	retail
95	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/28/2001	*** ***	08/28/2001	08/30/2001	08/29/2001	Day 1	resale
96	Dallas / Ft. Worth	*** ***	*** ***	*** ***	08/28/2001	*** ***	08/28/2001	08/31/2001	08/30/2001	Day 2	retail
97	Houston	*** ***	*** ***	*** ***	08/01/2001	*** ***	07/31/2001	08/02/2001	08/01/2001	Day 1	UNE-P
98	Houston	*** ***	*** ***	*** ***	08/02/2001	*** ***	08/02/2001	08/03/2001	08/02/2001	Day 0	retail
99	Houston	*** ***	*** ***	*** ***	08/03/2001	*** ***	08/03/2001	08/07/2001	08/06/2001	Day 1	UNE-P
100	Houston	*** ***	*** ***	*** ***	08/06/2001	*** ***	08/06/2001	08/08/2001	08/07/2001	Day 1	retail
101	Houston	*** ***	*** ***	*** ***	08/07/2001	*** ***	08/07/2001	08/10/2001	08/09/2001	Day 2	UNE-P
102	Houston	*** ***	*** ***	*** ***	08/07/2001	*** ***	08/07/2001	08/10/2001	08/09/2001	Day 2	retail
103	Houston	*** ***	*** ***	*** ***	08/07/2001	*** ***	08/07/2001	08/10/2001	08/09/2001	Day 2	retail
104	Houston	*** ***	*** ***	*** ***	08/08/2001	*** ***	08/08/2001	08/10/2001	08/09/2001	Day 1	UNE-P
105	Houston	*** ***	*** ***	*** ***	08/10/2001	*** ***	08/10/2001	08/13/2001	08/10/2001	Day 0	retail
106	Houston	*** ***	*** ***	*** ***	08/10/2001	*** ***	08/10/2001	08/13/2001	08/10/2001	Day 0	retail
107	Houston	*** ***	*** ***	*** ***	08/10/2001	*** ***	08/10/2001	08/13/2001	08/10/2001	Day 0	retail
108	Houston	*** ***	*** ***	*** ***	08/13/2001	*** ***	08/13/2001	08/14/2001	08/13/2001	Day 0	UNE-P
109	Houston	*** ***	*** ***	*** ***	08/13/2001	*** ***	08/13/2001	08/14/2001	08/13/2001	Day 0	retail
110	Houston	*** ***	*** ***	*** ***	08/14/2001	*** ***	08/14/2001	08/15/2001	08/14/2001	Day 0	retail
111	Houston	*** ***	*** ***	*** ***	08/14/2001	*** ***	08/14/2001	08/15/2001	08/14/2001	Day 0	UNE-P
112	Houston	*** ***	*** ***	*** ***	08/15/2001	*** ***	08/15/2001	08/16/2001	08/15/2001	Day 0	UNE-P
113	Houston	*** ***	*** ***	*** ***	08/16/2001	*** ***	08/16/2001	08/17/2001	08/16/2001	Day 0	retail
114	Houston	*** ***	*** ***	*** ***	08/17/2001	*** ***	08/17/2001	08/21/2001	08/20/2001	Day 1	retail
115	Houston	*** ***	*** ***	*** ***	08/16/2001	*** ***	08/16/2001	08/21/2001	08/20/2001	Day 2	resale
116	Houston	*** ***	*** ***	*** ***	08/17/2001	*** ***	08/17/2001	08/21/2001	08/20/2001	Day 1	retail
117	Houston	*** ***	*** ***	*** ***	08/20/2001	*** ***	08/20/2001	08/21/2001	08/20/2001	Day 0	retail
118	Houston	*** ***	*** ***	*** ***	08/20/2001	*** ***	08/20/2001	08/21/2001	08/20/2001	Day 0	retail
119	Houston	*** ***	*** ***	*** ***	08/20/2001	*** ***	08/20/2001	08/21/2001	08/20/2001	Day 0	resale
120	Houston	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
121	Houston	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
122	Houston	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	retail
123	Houston	*** ***	*** ***	*** ***	08/21/2001	*** ***	08/21/2001	08/22/2001	08/21/2001	Day 0	resale
124	Houston	*** ***	*** ***	*** ***	08/22/2001	*** ***	08/22/2001	08/23/2001	08/22/2001	Day 0	retail